

Serial No. 09/755,349

Atty. Docket No. 9038-120000

REMARKS

This application has been carefully reviewed in light of the Office Action dated April 10, 2003. In response thereto, applicant proposes an Amendment After Final in which non-elected claims 1-10 have been cancelled and claims 11-13 and 17 have been amended. If the proposed Amendment After Final is entered by the Examiner, then claims 11-19 will be pending in the application.

Entry of the amendment is respectfully requested because it is believed to place the application in condition for allowance or at least in better form for appeal without presenting new issues requiring substantial further consideration. Applicant hereby requests further examination and reconsideration in view of the following remarks.

The Examiner has rejected claims 11, 12 and 14-18 under 35 U.S.C. § 102(e) as being anticipated by Landaas. This ground of rejection is respectfully traversed in light of the present amendment.

Independent claim 11 recites a system for cleaning a structure. The system comprises a cleaning gas source and a liquid source. A mixing chamber is provided having a first inlet, a second inlet and an outlet. The first inlet is connected to the cleaning gas source, and the second inlet is connected to the liquid source. In addition, the second inlet includes a spray head for spraying liquid droplets into the mixing chamber. The system also comprises a means for coupling the mixing chamber outlet to the structure to be cleaned.

Landaas discloses a system having an expansion separator 2 that supplies gas to a mixing head 18 via a pump 3 and liquid to the mixing head 18 via a pump 12. The mixing head 18 combines the gas and liquid into an aerosol fog. The aerosol fog is directed to a fluid system A,B for treating internal surfaces thereof. While the mixing head 18 mixes gas and liquid, it does not

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include a spray head for spraying liquid droplets as required by claim 11. Thus, Landaas fails to anticipate claim 11 as amended.

For the above reasons, it is respectfully submitted that independent claim 11 is allowable over Landaas. Claims 12 and 14-18 depend from claim 11 and are thus also believed to be allowable. Furthermore, at least some of these dependent claims set forth limitations not met by the prior art. For instance, claim 12 recites a control valve located between the cleaning gas source and the mixing chamber. Landaas does not show a control valve located between the source of gas (i.e., the expansion separator 2) and the mixing head 18.

Regarding claim 14, the Examiner argues that the claimed heat exchanger and the expansion separator 2 are not patentably distinguishable because they condense liquid and particulate matter from gas/liquid mixtures. Applicant respectfully disagrees. Although both the claimed heat exchanger and the expansion separator 2 condense liquid, the heat exchanger condenses liquid via heat removal. See page 5 of the present specification, which states that the heat exchanger 33 cools and condenses the fluid/particulate mixture. There is no suggestion in Landaas that the expansion separator 2 cools the liquid/gas mixture. Furthermore, a "heat exchanger" is a well-recognized term of art that refers to a device in which heat is transferred from one fluid to another. The expansion separator 2 does not utilize heat transfer and thus cannot be considered to be a heat exchanger even though it provides a condensing function.

The Examiner has rejected claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Landaas in view of Bergman et al and claim 19 under 35 U.S.C. § 103(a) as being unpatentable over Landaas in view of Bartos et al. These grounds of rejection are respectfully traversed.

The Examiner relies on Bergman et al and Bartos et al for teaching use of gas filters and heaters and cleaning turbine buckets, respectively. As such, neither of these two references overcomes the above-described deficiency

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of the Landaas of not disclosing a mixing chamber having a spray head liquid inlet. Thus, Landaas modified by Bergman et al and Bartos et al, still fail to render claim 11 unpatentable. Because they both depend from claim 11, it is submitted that claims 13 and 19 are also allowable of the prior art.

In view of the above, it is submitted that the claims are in condition for allowance. Reconsideration of the objections and rejections is requested. Allowance of claims 11-19 at an early date is solicited.

Respectfully submitted,

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Date

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